

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
and LAUREN SALZMAN,

Defendants.

Case No. 18 Cr. 00204-NGG

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

Submitted on March 22, 2019

PLEASE TAKE NOTICE that the undersigned attorney, Marc Agnifilo, for the Defendant, KEITH RANIERE, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, for an order granting the following relief:

1. Motion to keep the current trial schedule of April 8, 2019 for jury selection and April 29, 2019 for opening statements, with parties exchanging case-in-chief trial exhibits and witness lists on April 7, 2019;
2. Motion to Dismiss the Indictment for lack of venue and to dismiss the recently added racketeering acts (as well as joining in co-defendants Bronfman, Allison Mack and Lauren Salzman's respective motions);
3. Motion for a Bill of Particulars (as well as joining co-defendant Bronfman's respective motions);
4. Motion to preclude the government's proposed experts;
5. Motion to Obtain Testimony from Foreign Witnesses, or in the alternative, take Rule 15 Depositions pursuant to Fed. R. Crim. Proc. 15.

These motions are based on this Notice of Motion and the accompanying Memorandum of Law in Support of Ranieri's Motions, and the above-referenced motions on which Ranieri is

joining. Raniere respectfully requests oral argument at the status conference currently scheduled for April 4, 2019, on these motions.

Dated: March 22, 2019
New York, NY

Respectfully submitted,



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